

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA
v.
SENG SAYSANASONGKHAM (1)
THIP THIPSIPASOM (2)
CAROLYNNE RHYS (3)
MARK RHYS (4)
MATTHEW RHYS (5)
AMY ANNICE McCULLOUGH (6)

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§
§

FILED UNDER SEAL

NO. 6:15CR66
Judge *Schneider*

FILED

NOV 12 2015

Clerk, U.S. District Court
Texas Eastern

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 1955 and 2
(Illegal Gambling Business and
Aiding and Abetting)

Beginning on a date unknown, but no later than on or about November 2014 and continuing until on or about June 10, 2015, in the Eastern District of Texas and elsewhere, **Seng Saysanasongkham, Thip Thipsipasom, Carolynne Rhys, Mark Rhys, Matthew Rhys, Amy Annice McCullough**, the defendants, and others known and unknown, did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit a gambling business involving eight-liner gaming machines, also known as slot machines, which gambling business was a violation of the laws of the State of Texas to wit, Texas Penal Code §§ 71.02, 47.02, 47.03, 47.04, and 47.06, and which involved five or

more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling business, and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day.

In violation of 18 U.S.C. §§ 1955 and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As the result of committing a violation of 18 U.S.C. § 1955 as alleged in this Information, the defendant shall forfeit to the United States of America pursuant to 18 U.S.C. § 982(a)(1)(c) and 28 U.S.C. § 2461, and 18 U.S.C. § 1955(d) all property, real or personal, constituting or derived from proceeds traceable to and property used in violation of 18 U.S.C. § 1955.

Substitute Assets


Moreover, if any property subject to forfeiture, as a result of any act or omission by the defendant (i) cannot be located upon the exercise of due diligence, (ii) has been transferred or sold to, or deposited with a third party, (iii) has been placed beyond the jurisdiction of the court, (iv) has been substantially diminished in value, or (v) has been commingled with other property which cannot be subdivided without difficulty, the defendant shall forfeit to the United States any other property of the defendant's up to the value of the forfeitable property.

A TRUE BILL

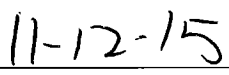


FOREMAN

JOHN M. BALES
UNITED STATES ATTORNEY



LESLEY D. BROOKS
Assistant United States Attorney



Date

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MATTHEW RHYS (5)	§	
AMY ANNICE McCULLOUGH (6)	§	

NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. § 1955

Penalty: Imprisonment for a term of not more than 5 years, a fine not to exceed \$250,000 or not more than twice the amount of criminally derived property involved in the transaction; supervised release for a term of not more than 3 years.

Special Assessment: \$100.00